UNITED STATES DISTRICT COURT		SUPPRESSED	
EASTERN DISTRICT OF MISSOURI EASTERN DIVISION		FILED	
UNITED STATES OF AMERICA,	)		JUN 20 2019 U.S. DISTRICY COURT EASTERN DISTRICY OF NICE
Plaintiff,	)		ST. LOUIS
<b>v.</b>	) ) No.	4:19CR	00469 HEA/SPM
RICARDO RUSAN,	į́		
Defendant.	. )		
	INDICTMENT		
	COUNT ONE		•

The Grand Jury charges that:

On or about April 16, 2019, in the Eastern District of Missouri,

## RICARDO RUSAN,

the defendant herein, by force and violence or by intimidation, took from the person and presence of an employee of the Commerce Bank, United States currency, belonging to and in the care, custody, control, management and possession of Commerce Bank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

## COUNT TWO

The Grand Jury further charges that:

On or about April 18, 2019, in the Eastern District of Missouri,

## RICARDO RUSAN,

the defendant herein, by force and violence or by intimidation, took from the person and presence of an employee of the Bank of America, United States currency, belonging to and in the

care, custody, control, management and possession of Bank of America, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN United States Attorney

EDWARD L. DOWD III #61909MO Assistant United States Attorney